

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 2005-10508-
RGS

JOSEPH E. BLAKE,
Plaintiff,

v.

ROBERT MURPHY, et al,
Defendants.

**MOTION TO FILE MEMORANDUM IN EXCESS OF
TWENTY PAGES OF DEFENDANT COMMONWEALTH OF
MASSACHUSETTS**

Now come defendants, Robert Murphy and Kathleen Dennehy, and move this Honorable Court to allow them to file a memorandum in support of their Motion to Dismiss/Summary Judgment, in excess of the 20 pages permitted pursuant to LR. 7.1(B)(4).

As grounds therefor, the defendants state that the plaintiff has filed a 25 page complaint and a 6 page amended complaint containing 111 paragraphs of allegations contained in 9 separate counts against the defendant. Furthermore, this Court has ordered the defendants to respond “in detail” to plaintiff’s allegations regarding his conditions of confinement. As such, it is in the interest of justice to allow the defendants to file a memorandum in excess of 20 pages in order to fully respond to the plaintiff’s numerous factual allegations, legal arguments and theories of recovery.

WHEREFORE, the Defendant respectfully requests that this Honorable Court allow this motion.

Defendants Robert Murphy and Kathleen Dennehy,

NANCY ANKERS WHITE
Special Assistant Attorney General

/s/ Brian P. Mansfield
By Brian P. Mansfield, Counsel
Department of Correction
Massachusetts Treatment Center
30 Administration Road
Bridgewater, Massachusetts 02324
(508) 279-8183
(508) 279-8181 (fax)
BBO # 564671

Dated: March 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that I did this day serve a photocopy of the above document upon the plaintiff by arranging for its delivery via the Department of Correction intra-facility mail system to him at Massachusetts Treatment Center, 30 Administration Road, Bridgewater, MA 02324.

/s/ Brian P. Mansfield
Brian P. Mansfield

Dated: March 20, 2006